

DECLARATION OF TOM VORH

I, Tom Vorh, declare and say:

1. I am a member of the Church of Scientology of California and have held the position of Archives In Charge since 1979. The archives I have been directly responsible for during this time have been known as the "Controller Archives" and have been operated out of the Controller's Office.

2. I have reviewed the document entitled "Declaration of Gerald Armstrong" dated 19 April 1983, which has been filed in the instant action as Exhibit B to "Defendant Gerald Armstrong's Memorandum in Opposition to Motion to Modify Preliminary Injunction and Writ for Possession," dated 20 April 1981. My review of said Declaration has disclosed numerous generalities, errors and/or untruths in this document which I have set forth herein to clarify these matters.

3. Mr. Armstrong states in paragraphs 10, 12, 26, 43, 44, 45 and 54 of the aforementioned declaration that Mrs. Hubbard ordered me to deliver to him the biographical materials contained in the "Controller Archives." That is a falsehood. Attached hereto as Attachment 1 is a copy of a request, dated 6 January 1981 (the original was mistakenly dated as 1980), from myself to Mrs. Hubbard. Attachment 1 clearly states that I:

"Would like to transfer 2 boxes of LRH  
historical items from the trunks to LRH Snr  
PPRO Researcher"

and that I was requesting Mrs. Hubbard to:

1                   "Approve the above 2 boxes to be sent to IRI. Our  
2                   IRAC researcher as non-archive historical items."  
3 Mrs. Hubbard did not order me to deliver any biographical materi-  
4 als to Mr. Armstrong; I requested her approval to do so in this  
5 one instance. Further, Mrs. Hubbard never ordered me to deliver  
6 any biographical materials to Mr. Armstrong at any time,  
7 either prior or subsequent to the above incident.

8                   4. In paragraphs 12 and 47, Mr. Armstrong claimed  
9 to have received "access" to "Controller Archives" from  
10 Mrs. Hubbard by virtue of the above request and approval.  
11 This is another falsehood as Mr. Armstrong was never granted  
12 access to the "Controller Archives" by Mrs. Hubbard, myself, or  
13 anyone else. Mr. Armstrong demonstrates his knowledge of this  
14 fact in paragraphs 10, 54 and 55 of the above Declaration in  
15 which he describes the obtaining of approval twice by myself  
16 before materials were delivered to him, and in the delay between  
17 the first and second deliveries caused by my lack of time for  
18 searching the "Controller Archives" to separate out any  
19 biographical materials for his use. If, as Mr. Armstrong claims,  
20 he had been authorized for access to these archives, there would  
21 have been no need for approval or delay as he would have been  
22 able to obtain these materials for himself. Further, as is  
23 evidenced by Attachment 1, the request I made of Mrs. Hubbard,  
24 which Mr. Armstrong is now citing as a blanket authorization  
25 for "access," was a request for approval to deliver certain,  
26 specifically listed, materials to Mr. Armstrong only after those  
27 same materials had been inspected and approved by Mrs. Hubbard.

28                   ///

1           5. In paragraphs 10, 47 and 54, Mr. Armstrong states  
2 that biographical materials were delivered to him "for the  
3 purpose of the biography." He is again, at least in part,  
4 mistaken. While I did state that:

5           "I believe many of the items in box 1 would be  
6 invaluable to the work they are presently doing  
7 on the LHM biography"

8 in Attachment 1, I also stated in that same document that:

9           "...I believe it would be correct per your  
10 dispatch of 26 Aug 80 ... to send them to LHM  
11 Snr PFRG Researcher for inclusion in his proposed  
12 museum. (Emphasis added)

13 As a result, Mrs. Hubbard authorized those specific materials,  
14 which she first inspected, to be transferred to Mr. Armstrong  
15 for inclusion in his proposed museum and for use in the  
16 biography project.

17           6. In paragraph 11, Mr. Armstrong states:

18           "...I did not approach Mr. Vorn after Mrs. Hubbard  
19 left her post in 1981. Arrangements had been made  
20 with Mr. Vorn as approved by Mrs. Hubbard prior  
21 to her leaving the Controller post."

22 Attached hereto as Attachment 2 is a copy of a request, dated  
23 10 October 1981, from myself to Gordon Cook, the person who  
24 assumed Mrs. Hubbard's position after she left her post in  
25 1981. It states:

26           "LHM Public Affairs Archivist has requested to  
27 obtain certain ... materials that we presently  
28 have in the C Archives."

1 As this shows Mr. Armstrong's statements are inaccurate.  
2 Mr. Armstrong did approach me between May 1981 and October 1981  
3 to request that biographical materials be delivered to him,  
4 with the result that I submitted the aforementioned request to  
5 Mr. Cook in the absence of Mrs. Hubbard. Mr. Armstrong and I  
6 had no arrangement whatever, as is demonstrated by Attachment 2,  
7 since there would have been no need to request permission of  
8 Mr. Cook had there been such an arrangement approved by  
9 Mrs. Hubbard.

10 7. In paragraph 47, Mr. Armstrong states:

11 "With respect to materials in Controller Archives  
12 and the Gilman Hot Springs (sic) storage, permission  
13 was required from either Mr. Hubbard, Mrs. Hubbard,  
14 or one of Mr. Hubbard's representatives (sic). I  
15 had the permission of all three for access..."

16 As was described supra, Mr. Armstrong did not have the permission  
17 of Mrs. Hubbard for access to the "Controller Archives." It is  
18 likewise false to state that one of Mr. Hubbard's representa-  
19 tives would have been able to give permission to enter the  
20 "Controller Archives" as the only persons authorized to give  
21 such permission were Mr. or Mrs. Hubbard themselves. In fact,  
22 on the few occasions that one of Mr. Hubbard's representatives  
23 requested to enter the Archives, I required that they first  
24 obtain Mrs. Hubbard's permission. It should be sufficient to  
25 point out that Mr. Armstrong himself has claimed to have been  
26 working directly for Mr. Hubbard and yet was required to request  
27 authorization for every single item he received from those  
28 Archives.

1 8. In paragraph 30. Mr. Armstrong states:  
2 "In Scientology, persons are trained and drilled  
3 in how to lie and how to cover up facts. I  
4 observed and was directed in such training  
5 myself. It is very obvious that the organization  
6 President, Mrs. Hubbard, Mr. Hubbard, Brenda  
7 Black, and Tom Vorn, have all lied in their  
8 statements and declarations. Lies are expected  
9 of Scientologists."

10 I have been a member of the Church of Scientology since  
11 February 1975 and have NEVER been "trained and drilled in how  
12 to lie and how to cover up facts." I have NEVER been  
13 "expected" to lie. Such a statement is totally contrary to  
14 every Scientology premise that I am familiar with and I am  
15 outraged that Mr. Armstrong has made the above statement  
16 regarding myself and my religious beliefs. If necessary, I  
17 can clarify more fully any of the preceding paragraphs or the  
18 inaccuracies of other of Mr. Armstrong's statements in his  
19 Declaration.

20 Executed this 22nd day of April, 1983, at Los Angeles,  
21 California.

22 I declare under penalty of perjury that the foregoing  
23 is true and correct.

24  
25  
26   
27 TOM VORN  
28

C *Jan 31.80*  
CC *Jan 7/1*  
CT *6/1/81*  
*I have both boxes in my office on hold.*  
*Seen*

6 January 1980

*FE*

C ARCH IC *[initials]*

CSW & COMPLIANCE  
RE: LRH HISTORICAL  
ITEMS

*Very good - approved.*  
*Much love*

Dear Sir,

Sit: Would like to transfer 2 boxes of LRH historical items from the trunks to LRH Snr PPRO Researcher.

Data: Per your order of 11 Dec 79 such materials are to be routed via yourself for approval before sending elsewhere. (order attached).

The items I wish to send include:

- Box 1: Year Book 1928
- Book of Photos - grey cloth cover
- Brown mounted photos
- Brown, engraved leather photo binder 5" x 4"
- Boy Scouts Diary 1924
- Photo Album dated 1912
- Collection of cuttings, photos and notes - Blue air-mail envelope Postmarked 3 Mar 38
- Jokes - envelope of clippings
- Letter from Thos. J. Kelly
  
- Sunburst cross and chain (gold)
- cufflinks - 1 set marked LH
- Sunburst cross pin & ornamental ribbon

Box 2: Approximately 30 assorted Science Fiction paperbacks which include LRH stories

The above are definitely "non-Archive" items.

All would be of some historical interest as personal materials of the Founder and therefore I believe it would be correct per your dispatch of 26 Aug 80 (attached) <sup>2,3</sup> to send them to LRH Snr PPRO Researcher for inclusion in his proposed museum.

In addition, I believe many of the items in box 1 would be invaluable to the work they are presently doing on the LRH biography.

Sol: Approve the above 2 boxes to be sent to LRH Snr PPRO Researcher as non-Archive historical items.

*[Signature]*  
App

This is OK.

*[Signature]*  
Disapp

Much Love,

*P.S. If approved it would probably be safer to just return these to me and I will take the over, rather than put them on other comm lines. m*

A/C  
via: A/C COMM

10 October 1981

C ARCHIVES IC

CSW

Re; non-Dn & Scn materials

Dear Gordon,

SIT: LRH Public Affairs Archivist has requested to obtain ~~my~~ certain non-Dn and Scn materials that we presently have in the C Archives.

DATA: Along with the file cabinets of original Dn and Scn tech, we presently have in the C Archives several trunks of material which are very miscellaneous and include early LRH org traffic, old LRH personal items (ie. family letters, his diary's as a boy, etc.) and other various things.

This material, as it is not part of the materials of Dn and Scn, ~~is not~~ does not really come under the C Archives but has been stored here mainly to keep it safe.

A few years ago, however, the post of LRH Snr PA Archivist was established (formerly Snr FPRO Researcher) in the Snr FPRO Bu, and he has been getting into this type of material and is currently using it to assist in the writing of an LRH biography.

So what I would like to do is turn some of this material over to him.

As an added note Gerry has been very very helpful in finding things for the C Archives and turning them over to me. Last year in his researching he found over 100 audio recordings by LRH made in 1949, and just recently he found and turned over 14 of the original LRH PDC lecture charts plus the original hand-drawn Chart of Human Evaluation drawn by LRH in 1951. And this is to name just a few.

He already has many many file cabinets of this type of material (ie. regarding LRH's personal life, etc.) and I feel this material we have rightly belongs with him.

Unfortunately this material we have is so miscellaneous and varied I can't give you a complete itemized breakdown. However, if I can have your permission I will inspect each item personally before it is turned over and ensure that it is not something that would belong in the C Archives.

SOL: Approve that I turn over <sup>certain</sup> items we have of a non-Dn & Scn nature to LRH Snr PA Archivist.

This is OK, M love.

*Gordo  
Very well  
Continue.*

A/C COMM

13 October 1981

C ARCHIVES

Re; Attached

Dear Yvonne,

Sorry to bother you again on this but I'm not certain whether the attached is approved or not.

I think it's an approval but would you please confirm this for me?

I don't want to act on this without making sure.

Thanks very much.

Much Love,

  
Tom

*[Faint handwritten notes and scribbles, possibly including the name 'Tom' and other illegible text]*

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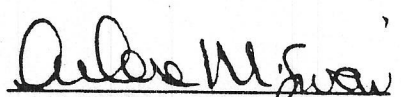
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PROOF OF SERVICE

I, the undersigned, certify and declare that I am a citizen of the United States, over the age of 18 years, employed in the County of Los Angeles, State of California, and not a party to the within action. On April 22, 1983 I caused to be served a true copy of the attached REPLY MEMORANDUM IN SUPPORT OF JOINT MOTION TO MODIFY PRELIMINARY INJUNCTION on the parties in said action by hand delivery addressed as follows: CONTOS and BUNCH, 5855 Topanga Canyon Boulevard, Suite 400, Woodland Hills, California 91367; HOWARD STECHEL, 6255 Sunset Boulevard, Suite 2000, Los Angeles, California 90028.

I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

Executed on April 22, 1983 at Los Angeles, California.

  
ARLENE M. SWAIN

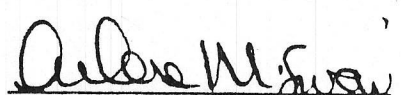
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